This is to request your support for the VRS (Video Relay Service) and to recognize VRS as a viable relay service for deaf and hard of hearing people. Below is an explanation of what VRS is and what the
FCC agency has been doing to seriously harm and limit the growth of this service.

The VRS for deaf and hard of hearing people who use American Sign Language as their primary or preferred mode of communication is the most functional equivalent technology to appear on the TRS screen. Communication via the TRS requires the use of a camera and computer or a TV and video link camera combined with broadband connections via cable or DSL. The person wishing to use the VRS uses the equipment to call a VRS provider (AT&T, Sprint, MCI,CSD, Hamilton, HOVRS, Sorenson, etc.) that provides a bank of certified sign language interpreters, one of whom appears on the caller's computer or TV screen, much like the CA (Communication Assistant or Operator) that answers the caller using the TRS. The VRS user signs to the VRS interpreter appearing on the screen the phone number to call. The VRS interpreter, like the TRS CA, wears a headset and microphone and makes the call. After the usual connection and explaining the VRS to the person answering the phone, the sign language interpreter signs or interprets what the person is saying and verbalizes or reverse interprets what the VRS sign language user is signing.

The flow and speed of communication meets the functional equivalency requirements of FCC that far exceeds current TRS technology that relies on the use of the TDD (Telecommunication Device for the Deaf) or the IP (Internet Protocol) Relay services via the computer. The speed of the traditional TRS or IP Relay communications is restricted by the typing speed of the TDD or CPU user as well as the CA's typing speed (minimum 60 WPM required of CA's), which at its best is far slower than typical voice communication. Voice communication between two hearing conversants is at minimum three times as fast and more typically 4 times faster. The interaction between the person using sign language and the person talking via the assistance of the VRS interpreter via the VRS is equally as fast.

When VRS was first used, NECA with the approval of FCC was reimbursing the VRS providers at the rate of at least $18.00 per minute. With this reimbursement rate, VRS users were getting interpreters on the screen in less than 30 seconds and the services were offered 24 hours per day, 7 days per week. Although the VRS had not yet been approved by FCC

as a viable communications relay service, the VRS providers were meeting, if not exceeding, most of the rules and regulations required of the TRS providers. Because of the superiority of this service compared to the TRS, the VRS industry grew rapidly. In the last year, FCC has cut the reimbursement rate to $14.00 per minute to $8.00 per minute to almost $7.00 per minute. As the rates were reduced, the quality of the VRS has rapidly deteriorated. In order to survive, the VRS providers have had to cut back on the numbers of interpreters in their phone bank as well as the hours that the services are available. Now the wait is often more than 10 minutes and sometimes as long as 45 minutes before an interpreter appears on the CPU or TV screen and the hours are restricted to day times and week days only, when demand is at its peak. Since VRS is not required to meet the FCC rules and regulations that apply to the TRS, the cutbacks are legitimate but the deaf or hard of hearing person who has difficulty with English and or typing has suffered.

Since the FCC has requested public comments, I request that the FCC approve the VRS as a viable and much needed service, require the VRS providers to meet the requirements similar to that of the TRS, (i.e. 80 percent of the calls must be answered within 10 seconds, 24/7, etc.), and to provide appropriate reimbursement to the VRS provider so that they meet the requirements.

Sincerely yours,

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